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PROPOSED ATTORNEYS FOR THE DEBTORS
AND DEBTORS IN POSSESSION

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re: § **CASE NO. 14-32821-11**
SEARS METHODIST RETIREMENT §
SYSTEM, INC., et al.¹ § **CHAPTER 11**
§
Debtors. § **Joint Administration Pending**

WITNESS AND EXHIBIT LIST

The above-captioned debtors and debtors in possession (collectively, the “Debtors”), hereby submit this Witness and Exhibit List for the hearing scheduled for June 12, 2012, at 9:30 a.m. Central Time (the “Hearing”) on the following matters:

1. Motion For Order Directing Joint Administration Of The Debtors’ Chapter 11 Cases [Docket #4; Filed 6/10/14];
2. Motion Of Debtors Pursuant To 11 U.S.C. §§ 105(a) And 363(b) For An Order Authorizing Payment Of Prepetition (I) Wages, Salaries, And Other Compensation Of Employees, (II) Employee Medical And Similar Benefits, And (III) Reimbursable Employee Expenses, And (IV) Other Miscellaneous Employee Expenses And Benefits [Docket #9; Filed 6/10/14];
3. Motion Of Debtors For Order Authorizing (I) Continued Use Of Existing Cash Management System, (II) Maintenance Of Existing Bank Accounts,

¹ The debtors in these chapter 11 cases, along with the last four (4) digits of their taxpayer identification numbers, are: Sears Methodist Retirement System, Inc. (6330), Canyons Senior Living, L.P. (8545), Odessa Methodist Housing, Inc. (9569), Sears Brazos Retirement Corporation (8053), Sears Caprock Retirement Corporation (9581), Sears Methodist Centers, Inc. (4917), Sears Methodist Foundation (2545), Sears Panhandle Retirement Corporation (3233), Sears Permian Retirement Corporation (7608), Sears Plains Retirement Corporation (8233), Sears Tyler Methodist Retirement Corporation (0571) and Senior Dimensions, Inc. (4016). The mailing address of each of the debtors, solely for purposes of notices and communications, is 2100 Ross Avenue, 21st Floor, c/o Paul Rundell, Dallas, Texas 75201.

(III) Continued Use Of Existing Business Forms, And (IV) Maintenance Of Existing Investment Practices [Docket #10; Filed 6/10/14];

4. Motion Of Debtors For Order Authorizing Debtors To File Consolidated Mailing Matrix And Consolidated List Of 30 Largest Unsecured Creditors [Docket #11; Filed 6/10/14];
5. Motion For An Order Pursuant To Bankruptcy Rule 1007 Granting An Extension Of Time For Filing Schedules And Statements Of Financial Affairs [Docket #12; Filed 6/10/14];
6. Motion Of Debtors For Order Authorizing The Debtors To Escrow Certain Entrance Deposits And Refund Certain Entrance Deposits [Docket #13; Filed 6/10/14];
7. Motion For Order Authorizing Retention of Professionals Utilized By Debtors In Ordinary Course Of Business [Docket #14; Filed 6/10/14];
8. Application Of The Debtors For Authority To Employ And Retain GCG, Inc. As Notice, Claims, and Solicitation Agent To The Debtors Nunc Pro Tunc To The Petition Date [Docket #15; Filed 6/10/14].
9. Motion Of The Debtors for Interim And Final Orders (I) Prohibiting Utilities From Altering, Refusing Or Discontinuing Service, (II) Deeming The Utility Companies Adequately Assured Of Future Performance, And (III) Establishing Procedures For Determining Requests for Additional Adequate Assurance [Docket #16; Filed 6/10/14];
10. Motion Of The Debtors For Entry Of Interim And Final Orders (I) Authorizing The Debtors To (A) Maintain Existing Insurance Policies And Pay All Obligations Arising Thereunder, (B) Maintain Financing Of Insurance Premiums And Pay All Obligations In Connection Therewith, and (C) Renew, Revise, Extend, Supplement, Change, Or Enter Into New Insurance Policies And (II) Granting Certain Related Relief [Docket #17; Filed 6/10/14];
11. Motion Of Sears Caprock Retirement Corporation For Interim And Final Orders (I) Authorizing The Use Of Cash Collateral, (II) Granting Adequate Protection, And (III) Scheduling A Final Hearing [Docket #19; Filed 6/10/14];
12. Motion Of Sears Tyler Methodist Retirement Corporation For Interim And Final Orders (I) Authorizing The Use Of Cash Collateral, (II) Granting Adequate Protection To The Trustee, And (III) Scheduling A Final Hearing [Docket #20; Filed 6/10/14];
13. Motion Of Odessa Methodist Housing, Inc. and Canyons Senior Living, L.P. For Interim And Final Orders (I) Authorizing The Use Of Cash Collateral, (II)

Granting Adequate Protection To Secured Lender, And (III) Scheduling A Final Hearing [Docket #21; Filed 6/10/14];

14. Motion Of Sears Plains Retirement Corporation For Interim And Final Orders (I) Authorizing The Use Of Cash Collateral, (II) Granting Adequate Protection To Secured Lender, And (III) Scheduling A Final Hearing [Docket #22; Filed 6/10/14]; and
15. Motion Of Debtors Sears Methodist Retirement System, Inc., Sears Permian Retirement Corporation, Sears Methodist Centers, Inc., Sears Panhandle Retirement Corporation, Sears Methodist Foundation, Sears Brazos Retirement Corporation And Senior Dimensions, Inc. For Interim And Final Orders Under 11 U.S.C. §§ 105, 361, 362, 363, And 364 And Bankruptcy Rules 2002, 4001, And 9014 (I) Authorizing Certain Debtors To (A) Use Cash Collateral And (B) Incur Postpetition Secured Indebtedness, (II) Granting Adequate Protection To Wells Fargo Bank, National Association, As Trustee, (III) Modifying The Automatic Stay And (IV) Scheduling A Final Hearing [Docket #23; Filed 6/10/14].

WITNESS LIST

1. Paul B. Rundell;
2. Anyone designated by any other party; and
3. Rebuttal and impeachment witnesses, as necessary.

EXHIBITS

1. Debtor Descriptions;
2. SMRS Long Term Debt Summary;
3. SMRS Facility Location Summary;
4. Anyone exhibits designated by any other party; and
5. Rebuttal and impeachment exhibits, as necessary.

Dated: June 11, 2014
Dallas, Texas

DLA PIPER LLP (US)

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